

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
BRYSON CITY DIVISION**

**EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,**

**Plaintiff,**

**and**

**SUSAN WILLIAMS,**

**Plaintiff-Intervenor,**

**v.**

**ANGEL MEDICAL CENTER, INC.,**

**Defendant.**

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**CIVIL ACTION NO.  
2:13-CV-00034-MR-DLH**

**JOINT MOTION FOR ENTRY OF CONSENT DECREE**

Plaintiff, the U.S. Equal Employment Opportunity Commission, Plaintiff-Intervenor, Susan Williams, and Defendant, Angel Medical Center, Inc., jointly move the Court to enter the attached proposed Consent Decree. In support of this motion, the parties state:

1. The parties have reached a settlement in this case.
2. The settlement agreement is memorialized in the proposed Consent Decree, with accompanying Exhibits, attached hereto for the Court's consideration.
3. In compliance with the Electronic Case Filing User's Manual (October 2011), a copy of the attached proposed Consent Decree will be submitted via CyberClerk, for the Court's consideration.

**WHEREFORE**, the parties respectfully request the Court enter the parties' proposed Consent Decree.

This 24<sup>th</sup> day of November, 2014.

**U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION, Plaintiff**

LYNETTE A. BARNES (NC Bar #19732)  
Regional Attorney

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**s/Amy E. Garber**

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**ATTORNEYS FOR PLAINTIFF**

**SUSAN WILLIAMS, Plaintiff-Intervenor**

**s/Stephan P. Agan**

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**ATTORNEYS FOR PLAINTIFF-  
INTERVENOR**

**ANGEL MEDICAL CENTER, INC.,  
Defendant**

**s/Jonathan Yarbrough**

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**ATTORNEYS FOR DEFENDANT**

## CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing *Joint Motion for Entry of Consent Decree* using the Court's CM/ECF filing system, which will provide notice of the filing of this document to the following counsel of record:

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## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

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